

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:21CR226
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	
)	
DAVIS LU,)	<u>UNOPPOSED MOTION TO AMEND</u>
)	<u>PROTECTIVE ORDER</u>
Defendant.)	

Now comes the United States of America, through its counsel, Michelle M. Baeppler, First Assistant United States Attorney and Daniel J. Riedl and Brian S. Deckert, Assistant United States Attorneys, and hereby submit this unopposed motion to amend the Stipulated Protective Order in the above-captioned criminal matter. The Addendum to the Stipulated Protective Order is necessary to protect sensitive information contained within potentially voluminous productions in this matter.

A proposed Addendum to the Stipulated Protective Order is attached, which counsel for the Defendant has reviewed and approved.

The proposed Addendum to the Stipulated Protective Order requests the Court to extend the provisions of the Protective Order to cover any documents or materials provided by third parties in response to valid legal requests and that all documents provided be subject to the same protections and restrictions set forth in that Order.

WHEREFORE, for the reasons cited above, the Government respectfully requests that the Court amend the Stipulated Protective Order.

Respectfully submitted,

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By:



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